

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE
COMPANY,

Defendant.

Case No. 2:24-cv-00093-JRG-RSP
(Lead Case)

JURY TRIAL DEMANDED

VIRTAMOVE, CORP.,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES
CORP.,

Defendant.

Case No. 2:24-CV-00064-JRG-RSP
(Member Case)

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR LEAVE TO SERVE SUPPLEMENTAL DAMAGES
REPORT**

Plaintiff VirtaMove, Corp. (“VirtaMove”) respectfully moves the Court for leave to serve Mr. Jim Bergman’s brief 7-page supplemental damages report.

Good cause exists for this motion because the supplemental damages report is based on new information regarding Hewlett Packard Enterprise Company and VirtaMove unavailable to Mr. Bergman when he served his opening report on damages.

VirtaMove has diligently corresponded with Defendant International Business Machines Corp. (“IBM”) who does not oppose this motion. This Motion is not made for purposes of delay

and will not prejudice any party.

Dated: July 15, 2025

Respectfully submitted,

/s/ Jonathan Ma

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CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for Plaintiff conferred with counsel for Defendant, and this motion is unopposed.

/s/ Jonathan Ma
Jonathan Ma

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via CM/ECF on July 15, 2025.

/s/ Jonathan Ma
Jonathan Ma